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Date: 9/14/2020 2:08:57 PM
Subject: TEAMS for review of ESD draft

Hi, all – Hope this smoke isn't making you too miserable. I feel like it got into my brain!

I would like to take a crack at setting up a time with whoever is going to review the draft LDW explanation of significant differences (ESD).

You'll be glad to know that it's quite short, after considerable cutting by EPA reviewers (and they recommended additional cuts, which I am considering). The new cleanup levels, TTLs, and RALs are in tables and are briefly discussed, but since one thing is changing – the cancer slope factor only - the appendix presents the equations used to calculate these values and the ESD mostly just says "here they are." This is how ESDs typically are: not stand alone documents. So if we adhere to the guidance, sections I included summarizing the RI, risk assessment, RAOs, RALs, FS, and remedy are not really needed. We may retain them to provide context/background for public commenters.

Priscilla, I'm not sure how much you've pored over the materials I sent previously, but the values may not be exactly the same as those you so. Elizabeth Allen noticed that the LDWG spreadsheet did the re-calculation using the same approach as the risk assessment, but there's an issue with the order of operations that affects the application of ADAFs to the stated age groups. Correcting that doesn't make a major difference in the values, and it isn't a change from the risk assessment approach.

Can I call one of you (Priscilla...?) and have you look at the calendar for a time that would work for Ecology reviewers in the next week or two? I could give you a briefing, walk you through the document, and have Elizabeth on the line for questions. We could stay connected while you read (and multitask until you want to ping us for questions) or leave the call (so you can talk amongst yourselves) and return at an appointed hour.

Tamara, I know you were not sure how this would work for Ecology, given the need for a block of time that works for everyone. I think two hours might be sufficient, believe it or not! We could also set up two hours for reading, give you a week for internal discussions, and have a followup review/discussion meeting.

What say you? Take care, all, and stay safe.

Elly



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